

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

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ROBERT ALEXANDER,  
a citizen of Nevada,

Plaintiff,

vs.

Case No.: 04-1323 PAM/RLE

CHARLES F. BOND, a citizen of Minnesota,  
and COKeM INTERNATIONAL, LTD.,  
a Minnesota corporation,

Defendant.

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DEPOSITION OF

ROBERT ALEXANDER

Taken March 22, 2005  
Commencing at 9:20 a.m.

**COPY**

REPORTED BY: DEBORAH A. MAVES, RPR

PARADIGM REPORTING & CAPTIONING  
1400 RAND TOWER

527 MARQUETTE AVENUE SOUTH  
MINNEAPOLIS, MINNESOTA 55402-1331

612-339-0545 \* 1-800-545-9668 \* Fax: 612-337-5575

Deposition of ROBERT ALEXANDER taken on the  
22nd day of March 2005, commencing at 9:20 a.m., at the  
law firm of Maslon Edelman Borman & Brand, LLP, 3300  
Wells Fargo Center, 90 South Seventh Street,  
Minneapolis, Minnesota, before Deborah A. Maves,  
Registered Professional Reporter and a Notary Public of  
and for the State of Minnesota.

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APPEARANCES

On behalf of the defendants:

William Z. Pentelovitch, Esq.  
Jason A. Lien, Esq.  
Maslon Edelman Borman & Brand, LLP  
3300 Wells Fargo Center  
90 South Seventh Street  
Minneapolis, Minnesota 55402-4140  
612-672-8200

NOTE: The original transcript will be delivered  
to William Z. Pentelovitch, Esq., as the taking party of  
the deposition.

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EXHIBITS MARKED AND REFERRED TO:

1	Notice of Taking Videotaped Deposition of	
2	Robert Alexander .....	4
3	Amended Notice of Taking Videotaped Deposition of	
4	Robert Alexander .....	4
5	Motion for Protective Order .....	4

(Original exhibits attached to original transcript.  
Copies attached to transcript copies.)

1 MR. PENTELOVITCH: The record should  
2 reflect that this is 9:20 a.m. on Tuesday, March 22,  
3 2005. We are in conference room 34B in the Maslon law  
4 firm in the Wells Fargo Center in Minneapolis, Minnesota  
5 for the deposition of Robert Alexander in the case  
6 entitled Robert Alexander versus Charles F. Bond and  
7 COKeM International, Limited, case No. 04-1323 pending  
8 in the United States District Court for the District of  
9 Minnesota. My name is Bill Pentelovitch and with me is  
10 Jason Lien and we represent the defendants.

11 There has been no appearance by the  
12 deponent, who is the plaintiff Robert Alexander,  
13 although the deposition was scheduled to begin 20  
14 minutes ago.

15 I'm going to mark and make as part of the  
16 record of this deposition Exhibit No. 1, which is the  
17 notice of taking the videotaped deposition of Robert  
18 Alexander, which was originally scheduled for January  
19 18th, 2005; I'm marking and making as part of the record  
20 as Exhibit 2 the amended notice of taking the videotaped  
21 deposition of Robert Alexander set for this morning,  
22 March 22nd, 2005, at 9 o'clock a.m.; and as Exhibit 3, I  
23 am making part of the record a motion for protective  
24 order and accompanying memorandum and declarations of  
25 David Layden and Robert Alexander, and those are marked  
collectively as Exhibit 3.

(Deposition Exhibit No. 1-3 marked.)

MR. PENTELOVITCH: The record should  
reflect that there has been no protective order entered  
by the court preventing this deposition from going  
forward; that the witness and his counsel were advised  
that we would go forward this morning and they've chosen  
not to appear; that the witness claims that he cannot  
appear for medical reasons, but despite several requests  
to his counsel, we received no verification from a  
physician, a hospital, clinic or other medical or health  
care provider that he in fact is medically unable to  
appear today.

This will adjourn the deposition for the  
time being, subject to further order of the court.

(Deposition adjourned at 9:23 a.m.)

REPORTER'S CERTIFICATE

STATE OF MINNESOTA     )  
                                  ) ss.  
COUNTY OF WASHINGTON )

I hereby certify that I reported the deposition proceeding on the 22nd day of March 2005, in Minneapolis, Minnesota;

That the proceeding was transcribed by me and is a true record of the statement made;

That the cost of the original has been charged to the party who noticed the deposition, and that all parties who ordered copies have been charged at the same rate for such copies;

That I am not a relative or employee or attorney or counsel of any of the parties, or a relative or employee of such attorney or counsel;

That I am not financially interested in the action and have no contract with the parties, attorneys, or persons with an interest in the action that affects or has a substantial tendency to affect my impartiality;

WITNESS MY HAND AND SEAL THIS 22nd of March 2005.

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Deborah A. Maves  
Notary Public, Washington County, Minnesota  
My commission expires January 31, 2010